



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7361

October 23, 1989
RP:0114

Mr. James K. Ikeda, Acting Chief
Environmental Management Division
Department of Health
P. O. Box 3378
Honolulu, Hawaii 96822

Dear Mr. Ikeda:

Zone of Mixing Applications (ZOM)
Hilo Coast Processing Company
Pepeekeo Mill
and
Hamakua Sugar Company, Inc.
Haina Factory
Hawaii

We have reviewed the Zone of Mixing applications for these facilities with the assistance of C. Anna Ulaszewski of the Environmental Center.

Pepeekeo Mill - ZM 143

Because of the geographical location of the discharge site for this facility and the turbulence created in the mixing zone, we foresee little impact on the receiving waters.

Haina Factory - ZM 197

It is our understanding that the data provided in Appendix A, Section C, Specific Water Quality Criteria Parameters, was obtained by analyzing the effluent at the point of discharge. Considering the poor quality of this effluent, as indicated by the data, we question whether the effluent is receiving the "best degree of treatment or control" as required by Chapter 54. According to Chapter 54-09-(c)-(6)-(A), "No renewal of zone of mixing established under this subsection shall be allowed without a thorough review of known and available means of preventing, controlling, or abating the discharge involved." We recommend that DOH make the determination whether or not "best degree of treatment or control" is being used.

Section (7) states that the ZOM may be renewed "provided that the applicant for renewal had met all of the conditions specified in the

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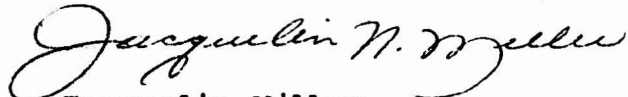
immediately preceding zone of mixing, and provided further that the renewal and the zone of mixing established in pursuance thereof shall provide for the discharge not greater in quantity of mass emissions than that attained pursuant to the terms of the immediately preceding zone of mixing at its expiration." We are unable to make this determine with the information provided by the application. The Water Quality Criteria Parameters stated in the 1987 application were obtain by analyzing ocean water sampled at the discharge point, not the effluent at the point discharge as was done for this application; Therefore we are unable to make a comparison. We recommend that samples of ocean water be taken from sites along the permieter of the zone of mixing and analyzed in order to determine if conditions of the previous ZOM have been met.

According to Section F-3 of this application, the present discharge flow is 10.5 mgd and the design flow is 14.8 mgd. The 1987 application states that discharge flow was 7.5 mgd and the design flow was 10.4 mgd. Does this increase in quantity of discharge preclude the issuance of the renewal of the ZOM pursuant to Section (7)?

We recommend that these issues be addressed prior to the renewal of this ZOM.

Thank you for the opportunity to comment on these ZOM applications.

Yours truly,



Jacquelin Miller
Associate Environmental Coordinator

cc: OEQC

L. Stephen Lau

C. Anna Ulaszewski